

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

DEMARLAND DEAN, KIMBERLY
VAN DECREEK, BRADLEY KIRK,
REYNOLD LEUTZ, TONDARIUS
ROTHCHILD, JASON JONES and
JOHN W. BOWER, individually and
on behalf of all others similarly
situated,

Plaintiffs,

v.

CUMULUS MEDIA, INC., and JOHN
DOES 1-10.,

Defendants.

CIVIL ACTION FILE

Case No.: 1:22-cv-04956-TWT

**PLAINTIFFS' UNOPPOSED MOTION FOR PRELIMINARY APPROVAL
OF CLASS ACTION SETTLEMENT, PRELIMINARY CERTIFICATION
OF SETTLEMENT CLASS, APPROVAL OF CLASS NOTICE, APPROVAL
OF PLAN OF ALLOCATION, AND SCHEDULING OF FAIRNESS
HEARING**

Plaintiffs Demarland Dean, Kimberly Van DeCreek, Bradley Kirk, Reynolds Leutz, Tondarious Rothchild, Jason Jones and John W. Bower (collectively, "Plaintiffs"), participants in the Cumulus Media 401(k) Plan (the "Plan") respectfully submit this Unopposed Motion for Preliminary Approval of Class Action Settlement Agreement (the "Settlement" or "Settlement Agreement"), entered into with Cumulus Media Inc. ("Defendants"), Preliminary Approval of

Class Notice, Approval of Plan of Allocation, and Scheduling of a Fairness Hearing (“Motion for Preliminary Approval) and respectfully move this Court for an Order granting the relief sought. The grounds for this motion are set forth in Plaintiffs and their Counsel’s declarations and the memorandum of law in support of this motion, which are submitted herewith.

A Proposed Order is submitted herewith.

Dated: February 14, 2023

Respectfully submitted,

CAPOZZI ADLER, P.C.

/s/ Mark K. Gyandoh

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Counsel for Plaintiffs and
the Proposed Class

CERTIFICATE OF SERVICE

I hereby certify that on a true and correct copy of the foregoing document was filed with the Court utilizing its ECF system, which will send notice of such filing to all counsel of record.

/s/ Mark K. Gyandoh
Mark K. Gyandoh